

EXHIBIT 2

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October 24, 2018

Via Email & US Mail

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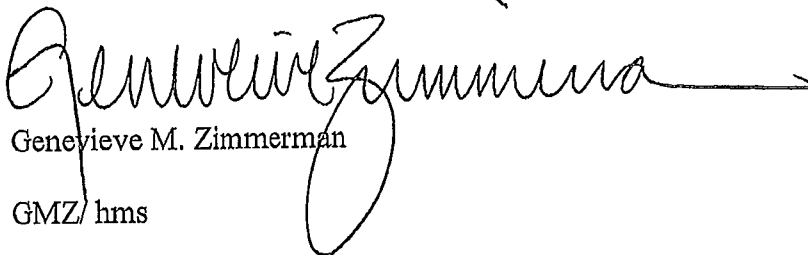
Re: 3M Bair Hugger Litigation- MDL No.15- 2666

Counsel,

We write to politely remind you of your client's ongoing obligations to supplement discovery propounded in the Bair Hugger MDL, as set forth in the Federal Rules of Civil Procedure. Our records show the only documents that have been produced since the December 2017 production of a limited portion of the materials supplied to the FDA in connection with the August 2017 letter are documents produced to your client by third parties. Surely there are a great many documents responsive to our discovery requests that have been generated and/or identified in the past year. In particular, and by way of example but not limitation, we would point to any and all documents related to the PILOT study Mr. Reed is participating in over in the UK, and any internal studies conducted by and/or funded by Defendants on the issues well known to the parties in this litigation.

Thanks in advance for your prompt attention to these ongoing obligations.

Best regards,


Genevieve M. Zimmerman
GMZ/hms